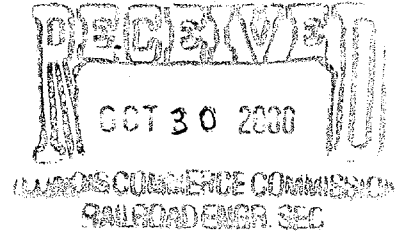


COPY

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION



CITY OF GRANITE CITY,  
an Illinois municipal corporation,

Petitioner,

ILLINOIS DEPARTMENT OF TRANSPORTATION  
GATEWAY EASTERN RAILWAY COMPANY,  
GATEWAY WESTERN RAILWAY COMPANY,  
NORFOLK SOUTHERN RAILWAY COMPANY,  
and UNION PACIFIC RAILROAD,

Respondents.

Docket No. T00-0003

**REQUESTS FOR PRODUCTION BY RESPONDENTS GATEWAY EASTERN RAILWAY  
COMPANY AND GATEWAY WESTERN RAILWAY COMPANY  
DIRECTED TO NORFOLK SOUTHERN RAILWAY COMPANY**

COME NOW Respondents Gateway Eastern Railway Company and Gateway Western Railway Company and pursuant to Section 200.360(c) of the Illinois Commerce Commission Rules of Practice and Rule 214 of the Illinois Rules of Civil Procedure propound the following Requests for Production to Norfolk Southern Railway Company to be answered in writing with a certificate of compliance under oath within 28 days of the date of service of these requests.

1. Any and all documents or reports prepared by or on behalf of Norfolk Southern Railway Company relating to any investigation, study or analysis of the Pontoon Road Grade Separation Project (including the reconfiguration of the 22<sup>nd</sup> Street grade crossing).

**RESPONSE:**

**DOCKETED**

10/30/03

2. Any and all documents that discuss how the Pontoon Road Grade Separation Project (including the reconfiguration of the 22<sup>nd</sup> Street grade crossing), or any portion thereof, benefits Norfolk Southern Railway Company.

RESPONSE:

3. Any and all documents that discuss or analyze the proposed reconfiguration of the 22<sup>nd</sup> Street grade crossing.

RESPONSE:

4. Any and all documents that analyze or discuss citations or summonses received by Norfolk Southern Railway Company from the City of Granite City for blocking the 22<sup>nd</sup> Street grade crossing at any time since 1990.

RESPONSE:

5. Any and all correspondence between Norfolk Southern Railway Company and the City of Granite City regarding the Pontoon Road Grade Separation Project (including the reconfiguration of the 22<sup>nd</sup> Street grade crossing) or the purchase of any property owned by Norfolk Southern Railway Company related to the project.

RESPONSE:

6. Any and all documents relating to communications between Norfolk Southern Railway Company and any representative of Illinois state government, including elected representatives, regarding the Pontoon Road Grade Separation Project (including the closing of the 22<sup>nd</sup> Street grade crossing), or the purchase of any property owned by Norfolk Southern Railway Company related to the project.

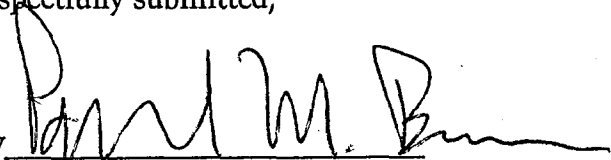
RESPONSE:

7. Any and all documents, including correspondence and contracts, relating to the sale or potential sale by Norfolk Southern Railway Company to the City of Granite City of property over which the Century Avenue extension or other connecting roadway would be constructed pursuant to the Pontoon Road Grade Separation Project (including reconfiguration of the 22<sup>nd</sup> Street grade crossing).

RESPONSE:

Respectfully submitted,

By



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Attorneys for Gateway Eastern  
Railway Company and Gateway  
Western Railway Company

OF COUNSEL:  
THOMPSON COBURN LLP

CERTIFICATE OF SERVICE

The undersigned states that a true and correct copy of the foregoing documents were deposited in the U.S. Mail, first Class, postage prepaid on the 26<sup>th</sup> day of October, 2000, addressed to each of the following:

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